

EXHIBIT D

INDEX IN SUPPORT OF MOTION TO SEAL SAVEONSP'S MOTION TO COMPEL JJHCS TO
RUN A SEARCH TERM OVER SCOTT WHITE'S FILES (ECF NOS. 475, 492 & 501)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to run a search term over Scott White's files, dated December 13, 2024 (ECF No. 475)</u>		JJHCS requests the redaction of information in and exhibits to the December 13 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the December 13 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2–5 and notes 1 & 2	Redactions discussing confidential exhibits					
Exhibits 1, 6, 11 & 14	Sealing of confidential documents and presentations containing competitively sensitive information.					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
Exhibit 2	Sealing of confidential work order with non- party vendor		competitors secured the information.			
Exhibits 4, 5, 7, 8, 9, 10, 12, 13 & 15	Sealing of emails and attachments discussing confidential information					
Exhibits 16 & 18	Redactions to discovery letters discussing confidential documents					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to run a search term over Scott White's files, dated January 13, 2025 (ECF No. 492)</u>		JJHCS requests the redaction of information in and the exhibit to the January 13 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that this letter and exhibit contain sensitive business information.	If filed on the public docket, these portions of the January 13 letter and the exhibit thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2 & 4–8 and note 5	Redactions discussing confidential exhibits					
Exhibit 1	Redactions to discovery letter discussing confidential documents					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to SaveOnSP's Motion to Compel JJHCS to run a search term over Scott White's files, dated January 27, 2025 (ECF No. 501)</u>		JJHCS requests the redaction of information in and exhibits to the January 27 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	<p>If filed on the public docket, these portions of the January 27 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2–6 and notes 1 & 2	Redactions discussing confidential exhibits					
Exhibits 21 & 24	Sealing of emails discussing confidential information					